

THE HONORABLE JAMES ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BRADY EDMONDS, on behalf of himself and
those similarly situated,

Plaintiff,

vs.

AMAZON.COM, INC., a Foreign for Profit
Corporation; AMAZON LOGISTICS, INC., a
Foreign for Profit Corporation; AMAZON.COM
SERVICES, INC., a Foreign for Profit Corporation,

Defendants.

NO. 2:19-cv-01613-JLR

**STIPULATION AND [PROPOSED] ORDER
EXTENDING DEADLINE FOR PLAINTIFF'S
RESPONSE TO MOTION TO INTERVENE
AND FOR LEAVE TO FILE MOTION TO
DISMISS, OR, IN THE ALTERNATIVE,
TRANSFER**

**NOTED FOR CONSIDERATION:
JUNE 15, 2020**

I. STIPULATION

To accommodate the schedules and workloads of counsel, Plaintiff Brady Edmonds, Defendants Amazon.com, Inc., Amazon Logistics, Inc., Amazon.com Services, Inc, and Proposed Intervenor Andrea Thomas and Felicia Gaines have agreed to extend the deadlines for the response and reply briefs related to the Motion to Intervene and for Leave to File Motion to Dismiss, or, in the Alternative, Transfer (Dkt. 55). Specifically, the parties stipulate to the following new deadlines:

- Response briefs shall be due on June 17, 2020;
- The reply brief shall be due on June 25, 2020; and
- The motion shall be re-noted for consideration on June 25, 2020.

RESPECTFULLY SUBMITTED AND DATED this 15th day of June, 2020.

TERRELL MARSHALL LAW GROUP PLLC

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Toby J. Marshall, WSBA #32726

By: /s/ Christopher K. Ramsey

Beth E. Terrell, WSBA #26759
Email: bterrell@terrellmarshall.com
Toby J. Marshall, WSBA #32726
Email: tmarshall@terrellmarshall.com
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
Telephone: (206) 816-6603
Facsimile: (206) 319-5450

Christopher K. Ramsey, *Admitted Pro Hac Vice*
Email: christopher.ramsey@morganlewis.com
One Oxford Centre, 32nd Floor
Pittsburgh, Pennsylvania 15219-6401
Telephone: (412) 560-3300
Facsimile: (412) 560-7001

Andrew R. Frisch, *Admitted Pro Hac Vice*
Email: afrisch@forthepeople.com
Paul M. Botros, *Admitted Pro Hac Vice*
Email: pbotros@forthepeople.com
MORGAN & MORGAN, P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Telephone: (954) WORKERS
Facsimile: (954) 327-3013

Ryan D. Redekopp, WSBA #36853
Email: ryan.redekopp@klgates.com
K&L GATES LLP
925 Fourth Avenue, Suite 2900
Seattle, Washington 98104
Telephone: (206) 623-7580
Facsimile: (206) 623-7022

Richard Rosenblatt, *Admitted Pro Hac Vice*
Email: richard.rosenblatt@morganlewis.com
MORGAN LEWIS & BOCKIUS LLP
502 Carnegie Center
Princeton, New Jersey 08540-6241
Telephone: (609) 919-6600
Facsimile: (609) 919-6701

Attorneys for Plaintiff

Attorneys for Defendants

BERGER MONTAGUE PC

By: /s/ Sarah R. Schalman-Bergen

Sarah R. Schalman-Bergen*

Email: sschalman-bergen@bm.net

Krysten L. Connon*

kconnon@bm.net

Michaela Wallin*

Email: mwallin@bm.net

Camille Fundora Rodriguez*

Email: crodriguez@bm.net

Alexandra K. Piazza*

Email: apiazza@bm.net

BERGER MONTAGUE PC

1818 Market Street, Suite 3600

Philadelphia, PA 19103

Direct: (215) 875-3053

Main: (215) 875-3033

Ryan Allen Hancock*

Email: rhancock@wwdlaw.com

WILLIG, WILLIAMS & DAVIDSON

1845 Walnut Street, 24th Floor

Philadelphia, PA 19103

Telephone: (215) 656-3600

Jose A. Klein, WSBA No. 47449

Email: jose@kleinmunsinger.com

Damien T. Munsinger, WSBA No. 50531

Email: damien@kleinmunsinger.com

KLEIN MUNSINGER LLC

1215 SE 8TH Avenue, Suite F

Portland, OR 97214

Telephone: (503) 568-1078

* Pro hac vice forthcoming

Attorneys for Proposed Intervenors

II. [PROPOSED] ORDER

IT IS SO ORDERED.

Dated this _____ day of _____, 2020.

UNITED STATE DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Toby J. Marshall, hereby certify that on June 15, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Ryan D. Redekopp, WSBA #36853
Email: ryan.redekopp@klgates.com
K&L GATES LLP
925 Fourth Avenue, Suite 2900
Seattle, Washington 98104
Telephone: (206) 623-7580
Facsimile: (206) 623-7022

Richard Rosenblatt, *Admitted Pro Hac Vice*
Email: richard.rosenblatt@morganlewis.com
MORGAN LEWIS & BOCKIUS LLP
502 Carnegie Center
Princeton, New Jersey 08540-6241
Telephone: (609) 919-6600
Facsimile: (609) 919-6701

Christopher K. Ramsey, *Admitted Pro Hac Vice*
Email: christopher.ramsey@morganlewis.com
MORGAN LEWIS & BOCKIUS LLP
One Oxford Centre, 32nd Floor
Pittsburgh, Pennsylvania 15219-6401
Telephone: (412) 560-3300
Facsimile: (412) 560-7001

Attorneys for Defendants

Jose A. Klein, WSBA No. 47449
Email: jose@kleinmunsinger.com
Damien T. Munsinger, WSBA No. 50531
Email: damien@kleinmunsinger.com
KLEIN MUNSINGER LLC
1215 SE 8TH Avenue, Suite F
Portland, OR 97214
Telephone: (503) 568-1078

1 Sarah R. Schalman-Bergen*
Email: sschalman-bergen@bm.net
2 Krysten L. Connon*
kconnon@bm.net
3 Michaela Wallin*
Email: mwallin@bm.net
4 Camille Fundora Rodriguez*
Email: crodriguez@bm.net
5 Alexandra K. Piazza*
Email: apiazza@bm.net
6 BERGER MONTAGUE PC
1818 Market Street, Suite 3600
7 Philadelphia, PA 19103
Direct: (215) 875-3053
8 Main: (215) 875-3033
9

10 Ryan Allen Hancock*
Email: rhancock@wwdlaw.com
11 WILLIG, WILLIAMS & DAVIDSON
1845 Walnut Street, 24th Floor
12 Philadelphia, PA 19103
Telephone: (215) 656-3600
13
14

15 * Pro hac vice forthcoming

16 *Attorneys for Proposed Intervenors*

17 DATED this 15th day of June, 2020.

18 TERRELL MARSHALL LAW GROUP PLLC
19

20 By: /s/ Toby J. Marshall, WSBA #32726
Toby J. Marshall, WSBA #32726
21 Email: tmarshall@terrellmarshall.com
22 936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
23 Telephone: (206) 816-6603
24 Facsimile: (206) 319-5450

25 *Attorneys for Plaintiff*
26
27